



January 13, 2012

United States Environmental Protection Agency Washington, DC 20450

RE: Metal Improvement - EPA ID # PAR000039420

To Whom it May Concern:

I am writing on behalf of our client Metal Improvement which is located in Bensalem, PA. They received a letter from the EPA stating that they did not complete their 2010 Annual Waste Report.

I just wanted to clarify this because the Gulfstream was the primary exporter of the waste on these two manifests (006898019JJK and 006898020JJK, both dated Dec 6, 2010.

We have corrected the copies on our end as well as the generator's copies to state "Gulfstream TLC Inc. Acting as an intermediary arranging for export. - EPA Notice ID: 202/10" I have also included a copy of the portion of the waste report that the Gulf Stream Submitted with the info for this particular incident.

Please feel free to contact me @ 484-275-6905 regarding this matter or if you will need any other info from me at this time.

Thank you and have a great day!

Sincerely,

Cheryl Fitzgerald
Cheryl Fitzgerald



15. E.P.A. Swilding, foil Gole 2354A Joo Jose Ave, No

Lobor 1

ATTW.

GULFSTREAM

February 18, 2011

Office of Enforcement and Compliance Assurance Office of Federal Activities International Compliance Assurance Division (2254A) US Environmental Protection Agency 1200 Pennsylvania, NW Washington, DC 20460

GULFSTREAM TLC INC. EPA ID # NYR000156539 ANNUAL REPORT FOR HAZARDOUS EXPORTS

To whom it may concern:

Enclosed please find Gulfstream Annual Report of Hazardous Waste Exports for calendar year 2010, and the annual Waste Minimization Statement as required by 40 CFR 262.56.

All waste was exported to Stablex Canada Inc. (EPA ID # NYD980756415) in Blainville, Québec.

Sincerely,

Henry Speranzini Vice President

Classes

Code (UN/NA)

018133 Chromic Acid Liquid

RQ Waste corrosive liquid, acidic, inorganic, n.o.s. 8

UN3264

EPA Codes D001-D011, D018-D019, D021-D030, D032-D040, D043, F001-F006, F019, F027-F028, F037-F039,

K002-K008, K021, K049, K052, K061-K062, K064-K066, K069, K071, K086, K088, K090-K091, K100, K106, P006, P010-P012, P015, P021, P058, P087, P113-P115, P119-P121, U032, U134-U146, U151,

U204-U205, U214-U217, U246

Notice File No: IMP 10-202 line no: 60

Transporter (s): FREEHOLD CARTAGE INC.

Total bulk shipments: 2

EPA ID No: NJD054126164

Total weight: 32.04 S. Tons

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8. Designated Facility Name and Site Address Stablex Canada, Inc. 760 Industrial Blvd. Facility Prime: 18. U.S. DOT Description (exclude) Proper Shipping Name, Hazard Class, D. Namber, 18. U.S. DOT Description (exclude) Proper Shipping Name, Hazard Class, D. Namber, 18. U.S. DOT Description (exclude) Proper Shipping Name, Hazard Class, D. Namber, 18. U.S. DOT Description (exclude) Proper Shipping Name, Hazard Class, D. Namber, 18. U.S. DOT Description (exclude) Proper Shipping Name, Hazard Class, D. Namber, 18. U.S. DOT Description (exclude) Proper Shipping Name, Lazard Class, D. Namber, 18. U.S. Dot Description (exclude) Proper Shipping Name, and Said Address 18. U.S. Chromitic acid, Nitric acid, N. U.N. 264 18. Special Handling Instructions and Additional Information A: L. L/C/E 0.23869 (Bulk Pacid - Teach D.S.) (U.N. 264 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. U.S. EPAL D. Number 19. Hazardous Waste Rigort Management Method Codes (a. a. codes for hazardous waste broatment, disposal, and recycling systems) 19. Hazardous Waste Rigort Management Method Codes (a. a. codes for hazardous waste broatment, disposal, and recycling systems) 19. Hazardous Waste Rigort Management Method Codes (a. codes for hazardous waste broatment, disposal, and recycling systems) 19. Hazardous Waste Rigort Management Method Codes (a. codes for hazardous waste broatment, disposal, and recycling systems) 19. Hazardous Waste Rigort Management Method Codes (a. codes for hazardous		6. Transporter 1 Company Name Freehold Cartage,	Inc.				U. N. 57019 5	42616	54		
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14. Special Handling Instructions and Additional Information	- GENE	-									
15. GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable infermational and national governmental regulations. If export shipment and I am the Primary Exporter, clerifly that the contents of this consignment conform to the terms of the attached EPA Actioned governmental regulations. If export shipment and I am the Primary Exporter, clerifly that the waste minimization statement identified in 40 CFR 262.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator's Offeror's PrintedTyped Name I and International Shipments Import to U.S. Port of entrylexit: Port of ent		4.		(i							
Generator's Offeror's Printed/Typed Name 16. International Shipments		GENERATOR'S/OFFEROR'S CERTIFICATION: I hereby declare that the marked and labeled/placarded, and are in all respects in proper condition f Exporter, I certify that the contents of this consignment conform to the term	e contents of this co for transport accord as of the attached E	onsignment are fi ling to applicable PA Acknowledgr	ully and accurately de international and nat ment of Consent.	escribed above ional governm	e by the proper shipping name, and are classified, packaged, nental regulations. If export shipment and I am the Primary				
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20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a	FACILITY	¥ . * .	F.				U.S. EPA ID No	umber		6	
20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a	ATED								Month	Day	Year
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	-		materiais cuvered t			1100			Month	Day	Year



LAND DISPOSAL RESTRICTIONS (LDR) NOTICE AND CERTIFICATION

Generator Name:	Metal Improvements Company, Inc.	EPA I.D. No.:	PAD000039420	
Manifest Doc. No.:	006898019JJK	State Manifest No.:		

(1) Manifest Page/ Line Item	(2) Hazardous Waste Code ^A (One per line)	(3) Wastewater/ Non-Wastewater ^B	(4) Subcategory (if applicable) ^c	(5) Underlying Constituents? ^D (Circle one)	(6) Contaminant	(7) Application Certification ^E (One per line)
1/A	D002	NWW		No	*	
1/A 1/A	D007	NWW		No		
		WW / NWW		Yes / No / NA		
•		WW / NWW		Yes / No / NA		
		WW / NWW		Yes / No / NA		
		WW / NWW		Yes / No / NA	- The state of the	

- A To list additional waste codes complete a Stablex LDR Continuation Form (STXLBR2).
- B Must check one, either wastewater or non-wastewater.
- C Enter « NA » if no subcategory is applicable to the waste code (see Annex A or 40 CFR 268.40).
- D If « Yes » is circled, identify contaminant in Column 6.
- E Choose from list of certifications below and enter number. Enter only one number per line. Enter date waste is subject to prohibition if Certification #3 applies.
- (1) Waste Does Not Meet Applicable Treatment Standards This is a restricted waste that does not meet the applicable treatment standards set forth in Subpart D of 40 CFR Part 268 or section 268.49 when applicable.
- (2) Waste Meets Applicable Treatment Standards I certify under penalty of law that I personally have examined and am familiar with the waste through analysis and testing or through knowledge of the waste to support this certification that the waste complies with the treatment standards specified in 40 CFR Part 268 Subpart D or section 268.49 when applicable. I believe that the information I submitted is true, accurate and complete. I am aware that there are significant penalties for submitting a false certification, including the possibility of a fine and imprisonment.
- (3) Waste Subject to Exemption This waste is subject to an exemption from a prohibition, such as a case-by-case extension, an exemption, or a nationwide capacity variance. (Include date subject to LDR in Column 7).
- (4) Waste Treated to Applicable Treatment Standards (choose one):
 - I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the treatment process has been operated and maintained properly so as to comply with the treatment standards specified in 40 CFR Part 268.40 without impermissible dilution of the prohibited waste. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- (5) Characteristic Waste Treated to Remove Characteristic (choose one):
 - (5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
 - (5b) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268.2(i), have been treated on-site to meet the 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- (6) Lab Pack Managed According to Alternative Treatment Standard at 40 CFR 268.42(c) (INCIN) I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

I certify that the information provided on this and any additional pages	(STXLDR2) of this LDR	notification is	true, accurate and complete.
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Authorized Signature:

Company/Title:

Date:

Print or Type Name:

Michael Dardale z

Stablex does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

SCI-1000-15/oct04



FREEHOLD CARTAGE INC.

P.O. BOX 5010 • FREEHOLD, NJ 07728-5010 (732) 462-1001 • FAX (732) 308-0924

BILL OF LADING FCI EPA ID NO. NJD054126164

\$ 275310

350 Pigeon Point Road New Castle, DE 19720 Phone: (302) 658-2005 Fax: (302) 658-6229 175 Bartow Mun. Airport Bartow, FL 33830 Phone: (863) 533-4599 Fax: (863) 533-1613 5533 Dunham Road Maple Heights, OH 44137 Phone: (330) 835-3473 Fax: (330) 835-3732 108 Monahan Avenue Dunmore, PA 18512 Phone: (570) 342-7232 Fax: (570) 342-7367 132 Myrtle Beach Hwy. Sumter, SC 29153 Phone: (803) 773-2611 Fax: (803) 773-2942

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3434 State Road Bensalem, PA 19020 8. Presenting Process Recording Recording Process Recording Proces	WASTE MANIFEST	1. Generato JANO000039420	1	Kapid KE	50-56	00	6898		JJK				
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Transporter 2 Company Name U.S. EPA D Number	AST SALES FORE	38-0888 Bensalem, PA	19020										
B. Designated Facility Name and Sile Address Stablex Canada. Inc. 760 Industrial Blvd. (450) 430-9230 Blainville, Quebec. J7C3V4 Facility & Phone: Sa. Seu U.S. DOT Description (excluding Proper Shipping Name, Hazard Class., D Number. All Rev. Waste Corrosive liquid, acidic, inorganic, no. s., (Chronic acid, Nitric acid), 8, UN3264 Ol T 5700 G D0027 P.G.—II (D002, D007) 14. Special Handing instructions and Additional Information A: L/C/E 023860 Bl/K Pacid - Tank & Sp. (Lagrange of Shipping Name, and acidic packaged, manufact and belegiphaceted, and see in largeon in proper confidence in the second second service shipping name, and see classification and and belegiphaceted, and see in largeon in proper confidence in the second second service shipping name, and see classification in the Service of the second second service shipping name, and see classification in the Service of the second second service shipping name, and see classification in the Service of the second second service shipping name, and see classification in the Service of the second second service of service shipping and service services. Second services of the second second services of the second services of second services of the second second services of the second second services of services of second services of the second second services of services of second ser	6. Transporter 1 Company Name	Freehold Cartage, Inc.	8			NJD054126164							
Stablex Canada. Inc. (450) 430–9230 Blainville, Quebec. Facility's Phone: Sa. 9u. S. DOT Description (including Proper Shipping Name. Hazard Class, ID Number. As and Packing Group (1847)) IRQ, Waste Corrosive liquid, acidic, inorganic, N. n. Type Quantity Wurfel. 13. Wissle Codes No. Type Quantity Wurfel. 13. Wissle Codes No. Type Quantity Wifel. 13. Wissle Codes No. DOO2. RQ.—II (DOO2., DOO7.) 2. 14. Special Harding Instructors and Additional Information A: L/C/E Q23869 BMR Acid.—Tork # B3. Group Statement Tipe. BB: DOTSP—9 Go Large Statement Tipe. See Consequence of the Company of the Statement Tipe. BB: DOTSP—9 Go Large Statement Tipe. Generally of the waster information statement beneficial in a large could be proper condition for imagent according to applicable information and instruction and in a microsid provenmental registrics. In export application, in epoch to proper group and an area of the Statement Company of the Statement	7. Transporter 2 Company Name				3-	U.S. EPA ID Number							
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14. Special Handling Instructions and Additional Information A: L/C/E 15. GENERATOR'SIOFFEROR'S CERTIFICATION: I hereby deciare that the contents of this consignment are fully and accurately described above by the proper shipping name, and are classified, packaged, method and labelled scheduled, and are in all respects in proper confidence to transport according to applicable international and malonial governmental regulations. If export shipment and I am the Primary Locatify, that the vasis minimization between the standard property of (b) (f) and a single quantity generator) is true. Generator's Cifferor's PrintedTyped Name 16. International Shipmants Transporter alignature (for coports only) 17. Transporter alignature (for coports only) 18. Discrepancy 18. Discrepancy 18. Alternate Facility (or Generator) 18. Alternate Facility (or Generator) 18. Alternate Facility (or Generator) 19. Hazandous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2 20. Designature of Alternate Facility (or Generator) 19. Hazandous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2 20. Designature of Alternate Facility (or Generator)					 	3,00	9		+				
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14. Special Handling Instructions and Additional Information A: L/C/E B: DOTSP—9166 Instructions of this consignment are fully and accurately described above by the proper shipping name, and are cassified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If exports shipment and I am the Primary Exporter, Lording that the contents of this consignment are fully and accurately described above by the proper shipping name, and are cassified, packaged, marked and labeled/placarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exporter, Lording that the contents of this consignment of the Backed Primary Exporter, Lording that the contents of this consignment of the Backed Primary Exporter, Lording that the contents of this consignment and I am the Primary Exporter (Lording that the Content I are primary I all and I am the Primary Exporter (Lording that the Content I are primary I all and I am the Primary Exporter (Lording that the Content I are primary I													
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marked and labeled/jobacarded, and are in all respects in proper condition for transport according to applicable international and national governmental regulations. If export shipment and I am the Primary Exports, I certify that the waste minimization statement identified in 40 CFR 282.27(a) (if I am a large quantity generator) or (b) (if I am a small quantity generator) is true. Generator/offeror's Printed/Typed Name Signature Month Day 17. Transporter Acknowledgment of Resignet Printed/Typed Name Signature Fransporter Acknowledgment of Resignet Printed/Typed Name Signature Month Day 17. Transporter Acknowledgment of Resignet Printed/Typed Name Signature Month Day 18. Discrepancy 18a. Discrepancy Indication Space Quantity Type Residue Partial Rejection Manifest Reference Number: 18b. Alternate Facility (or Generator) Month Day 19. Hazardous Waste Report Management Method Codes (i.e., codes for hazardous waste treatment, disposal, and recycling systems) 1. 2. 3. 4. 20. Designated Facility Owner or Operator: Certification of receipt of hazardous materials covered by the manifest except as noted in Item 18a	B;	023869 BUK Reid	166 -	DIGULST Entrance	kenon linny	TLC I	- Ag	1830 -	63				
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Generator Name:

LAND DISPOSAL RESTRICTIONS (LDR) NOTICE AND CERTIFICATION

EPA I.D. No .:

Metal Improvements Company, Inc.

Page 1 of 1 STXLDR1

PAD000039420

Manifest Doc. No.	006898019J	JK	State Mar	ifest No.:		
(1) Manifest Page/ Line Item	(2) Hazardous Waste Code ^A (One per line)	(3) Wastewater/ Non-Wastewater ^B	(4) Subcategory (if applicable) ^C	(5) Underlying Constituents? ^D (Circle one)	(6) Contaminant	(7) Application Certification ^E (One per line)
1/A	D002	NWW		No		
1/A	D007	NWW		No		
		WW / NWW		Yes / No / NA		
•		WW / NWW		Yes / No / NA		
		WW / NWW		Yes / No / NA		
		WW / NWW		Yes / No / NA		
A To list addition	onal waste codes co	mplete a Stablex LDR	Continuation Form		78	
		er or non-wastewater.			I F	
C Enter « NA »	if no subcategory is	applicable to the was	ste code (see Anne	x A or 40 CFR 268.40).	
D If « Yes » is	circled, identify conta	aminant in Column 6.				
E Choose from if Certification		below and enter num	ber. Enter only on	e number per line. En	ter date waste is si	ubject to prohibition
		eatment Standards - This		e that does not meet the	applicable treatment	standards set forth in
analysis and to 40 CFR Part 2	esting or through know 68 Subpart D or section	rledge of the waste to su on 268.49 when applicab	apport this certification le. I believe that the	I personally have examir in that the waste complie information I submitted is possibility of a fine and in	s with the treatment s s true, accurate and o	standards specified in
		waste is subject to an le date subject to LDR in		rohibition, such as a ca	se-by-case extension	, an exemption, or a
(4) Waste Treated	to Applicable Treatme	ent Standards (choose or	ne):			
proc belie	ess used to support the	is certification. Based o process has been operat	n my inquiry of those ed and maintained p	miliar with the treatment individuals immediately operly so as to comply w . I am aware there are	responsible for obtain with the treatment star	ning this information, indards specified in 40

(5) Characteristic Waste Treated to Remove Characteristic (choose one):

certification, including the possibility of fine and imprisonment.

(5a) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic. This decharacterized waste contains underlying hazardous constituents that require further treatment to meet Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

aware there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.

I certify under penalty of law that I have personally examined and am familiar with the treatment technology and operation of the treatment process used to support this certification. Based on my inquiry of those individuals immediately responsible for obtaining this information, I believe that the nonwastewater organic constituents have been treated by combustion units as specified in 268.42, Table 1. I have been unable to detect the nonwastewater organic constituents, despite having used best good faith efforts to analyze for such constituents. I am

- (5b) I certify under penalty of law that the waste has been treated in accordance with the requirements of 40 CFR 268.40 to remove the hazardous characteristic, and that underlying hazardous constituents, as defined in 268.2(i), have been treated on-site to meet the 268.48 Universal Treatment Standards. I am aware that there are significant penalties for submitting a false certification, including the possibility of fine and imprisonment.
- 6) Lab Pack Managed According to Alternative Treatment Standard at 40 CFR 268.42(c) (INCIN) I certify under penalty of law that I personally have examined and am familiar with the waste and that the lab pack contains only wastes that have not been excluded under Appendix IV to Part 268 and that this lab pack will be sent to a combustion facility in compliance with the alternative treatment standards for lab packs at 40 CFR 268.42(c). I am aware that there are significant penalties for submitting a false certification, including the possibility of fine or imprisonment.

I certify that the information	provided on this and ar	v additional pages	(STXLDR2) of this LDR no	otification is true.	accurate and c	omplete.

Authorized Signature:	Bodaly	Print or Type Name: Michael Baydalez	
Company/Title:	Mefal Improvement	EHS Complion a Specialit	
Date:	12/6/10		

Stablex does not warrant the acceptability of this form for any specific purpose, waste or treatment method and does not warrant that its use will constitute compliance with applicable law and expressly disclaims responsibility or liability, for any penalties, damages or other costs which may arise out of or be related to use of this document.

(4b)



FREEHOLD CARTAGE INC.

P.O. BOX 5010 • FREEHOLD, NJ 07728-5010 (732) 462-1001 • FAX (732) 308-0924 BILL OF LADING FCI EPA ID NO. NJD054126164

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114 Schoolground Rd. Branford, CT 06405 Phone: (203) 483-5964 Fax: (203) 483-5984 350 Pigeon Point Road New Castle, DE 19720 Phone: (302) 658-2005 Fax: (302) 658-6229 175 Bartow Mun. Airport Bartow, FL 33830 Phone: (863) 533-4599 Fax: (863) 533-1613 5533 Dunham Road Maple Heights, OH 44137 Phone: (330) 835-3473 Fax: (330) 835-3732 108 Monahan Avenue Dunmore, PA 18512 Phone: (570) 342-7232 Fax: (570) 342-7367 132 Myrtle Beach Hwy. Sumter, SC 29153 Phone: (803) 773-2611 Fax: (803) 773-2942

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